



J1

PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Docket No: Q63313

Jun-hyeong KIM

Appln. No.: 09/900,460

Group Art Unit: 2151

Confirmation No.: 4214

Examiner: PATEL, DHAIRYA, A.

Filed: July 9, 2001

For: GATEWAY AND A METHOD FOR OPERATING THE SAME

RESPONSE UNDER 37 C.F.R. § 1.111

MAIL STOP AMENDMENT

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Sir:

In response to the Office Action dated September 27, 2004, please consider the remarks as submitted herewith on the accompanying pages.

REMARKS

Summary Of The Office Action

Claims 1-20 are pending in the application.

Claims 1, 7, 8, 12 and 20 are rejected under 35 U.S.C. § 112, second paragraph.

Claims 1-3, 6-7 and 9-12 are rejected under 35 U.S.C. § 102(a) as being anticipated over Bhatia et al. (USP 6,052,803).

Claims 4, 5 and 13-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatia et al. in view of Huitema et al. (USP 6,178,451).

RECEIVED
JAN 3 2005
Technology Cen...

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

Claims 8 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bhatia et al. in view of Huitema et al. and further in view of Asami et al (US Publication No. 2001/0023459).

The Examiner objects to the title as not being descriptive, and suggests the title “Gateway And A Method For Operating The Gateway”. The title is changed as suggested by the Examiner.

Claim Rejections Under 35 U.S.C. § 112

In rejecting claims 1, 7, 8, 12 and 20, under 35 U.S.C. § 112, second paragraph, the Examiner finds the terms “control request” and “interruption request” to be unclear. The Examiner states that the specification does not mention anything about what these terms mean.

Applicant respectfully submits that the meanings of these terms are clear. More specifically, the specification at page 11, beginning at line 11, describes that if a control request of a local device that is connected to a home network is received from a remote device that requests access, the controller 70 of Fig. 4 requests a function performance suitable for the local device according to the contents of the control request. Thus, it is clear that a remote device controls a function of a local device by sending a control request to the local device. This aspect of the invention is further explained at page 15, beginning at line 7. There, it is explained that if a packet, including information about a home information appliance selection, is received from a remote device (Fig. 5B, step S5-5), detailed control contents for the selected home information appliance are transmitted to the remote device (step S5-6). If a detailed control request is received from the remote device (step S5-7), the received control request packet is used to request a function performance of a corresponding local device (step S5-8). Thus, this section of

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

the specification also makes clear that a control request is transmitted from a remote device to a local device to control a function of the local device.

With respect to the term “interruption request”, this term is explained in the specification at page 14, beginning at line 4. There, it is described that a local device requests an interruption of the use of a private IP address (Fig. 5A, step S4-5). In response to this interruption request, the HG_DHCP server transfers a delete update request of the local device to the HG_DNS server (step S4-6). The HG_DNS server receives the update request and deletes the contents related to the private IP address and the host name stored in the database (step S4-7). Thus, it is clear from this description that an interruption request is used to delete the contents related to the private IP address and the host name from the database.

In view of the above, Applicant respectfully requests the Examiner to remove the rejection of claims 1, 7, 8, 12 and 20, under 35 U.S.C. § 112, second paragraph.

Claim Rejections Under 35 U.S.C. § 102

In rejecting claims 1, 2, 3, 6, 7 and 9-12 under 35 U.S.C. § 102(a) as being anticipated by Bhatia et al, the Examiner provides analysis purporting to show that Bhatia teaches each of the claimed elements. Applicant respectfully disagrees with the Examiner’s analysis for at least several reasons.

Claim 1 recites *inter alia*:

a controller which, if a control request with respect to either of the information appliances connected to the internal network is received from the information appliances connected to the external

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

network, requests a function performance to a corresponding information appliance through the first interface according to requested controlled contents.

The Examiner cites several sections of Bhatia as collectively teaching the claimed controller. In the last paragraph of page 3 of the Office Action, the Examiner states: "The ISDN LAN modem (controller) which examines all the packets incoming (control requests) from remote network (external network) and routes all such packets (function performance) destined for any of the workstation on the static subnet to the LAN (first interface)." Thus, the Examiner seems to be stating that the incoming packets from the remote network correspond to the claimed control request. Applicant respectfully submits that this is not the case.

As explained above in the portion of this Response relating to the claim rejection under 35 U.S.C. § 112, a control request is a request to control a function of a local device. There is no teaching, or even suggestion, in Bhatia that the packets transmitted from the remote network to the modem have anything to do with controlling local devices. Therefore, for at least this reason, Applicant submits that claim 1 is not anticipated by Bhatia.

Regarding claim 2, which depends from claim 1, claim 2 recites, *inter alia*:

an application proxy server which transmits a list of the information appliances connected to the internal network in accordance with an access request of the information appliances connected to the external network, and transmits contents which control an information appliance selected from the transmitted list, and, if a control command is transmitted, requests a function performance to a corresponding

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

information appliance according to the requested control command.

In his analysis of claim 2, the Examiner cites col., 43, lines 53-55 and col., 43, line 66 to col., 44, line 1 as teaching an application proxy server which transmits a list of the information appliances connected to the internal network in accordance with an access request of the information appliances connected to the external network. Applicant does not believe that Bhatia et al., in the cited portions or elsewhere, teaches or suggests these features. The cited portions of Bhatia only disclose a DNS server that routes queries. There is no teaching of transmitting a list of information appliances in accordance with an access request of the information appliances connected to the external network.

The Examiner cites Bhatia, at col., 43, lines 58-66 as teaching an application proxy server that transmits contents which control an information appliance selected from the transmitted list, and if a control command is transmitted requests a function performance to a corresponding information appliance according to the requested control command. However, as discussed above in connection with the rejection of claim 1, Bhatia does not teach transmitting contents which control an information appliance or requesting a function performance to a corresponding information appliance according to the requested control command.

Claim 7 depends from claim 2 and further defines the operation of the application proxy server. In rejecting claim 7, the Examiner cites Bhatia at col., 44, lines 51-57 as teaching “if a response to the control request is transmitted from the corresponding control-requested information appliance connected to the internal network, notifying the response result to the control-requesting information appliance connected to the external network.”

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

However, this portion of the reference only teaches a procedure for providing a host IP address in response to a DHCP request packet in order to effectuate machine name to IP address resolution for an additional workstation (host) that has been connected to the LAN. There is no teaching, or even suggestion, that a control requested information appliance notifies the response result to the control-requesting information appliance of the external network.

Regarding the rejections of claims 10, 11 and 12, Applicant submits that these claims are patentable for reasons similar to those presented above with respect to claims 1, 2 and 7, respectively.

Claim Rejections Under 35 U.S.C. § 103

Claims 4, 5 and 13-20 are rejected under 35 U.S.C. § 103 as being unpatentable over Bhatia et al, in view of Huitema et al. These claims, which depend directly or indirectly from claims 1 or 10, are believed to be patentable because Bhatia et al fails to teach or suggest the features discussed above and because Huitema et al does not make up for these deficiencies.

Claims 8 and 20 are rejected under 35 U.S.C. § 103 as being unpatentable over Bhatia et al in view of Huitema et al and further in view of Asami et al. Applicant submits that claims 8 and 20 are patentable over the combination of applied references because Asami does not make up for the deficiencies of Bhatia and Huitema that were discussed above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. APP. NO. 09/900,460

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Peter A. McKenna
Registration No. 38,551

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: December 23, 2004